

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

This Document Relates to:  
  
ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

**PLAINTIFFS' UNOPPOSED  
ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE SUPPLEMENTAL  
AUTHORITY**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 7-3(d), the State Attorneys General, Personal Injury, and School District/Local Government Entity Plaintiffs (collectively, "Plaintiffs") submit this Unopposed Administrative Motion for Leave to File Supplemental Authority to bring to the Court's attention the recent ruling in *Anderson v. TikTok, Inc.*, \_\_\_ F.4th \_\_\_, 2024 WL 3948248 (3d Cir. Aug. 27, 2024) (attached hereto as **Exhibit A**).

Plaintiffs submit this decisions in support of their arguments regarding section 230 of the Communications Decency Act, 47 U.S.C. § 230, raised in the following briefs:

- (1) Personal Injury and School District/Local Government Entity Plaintiffs' Opposition to Defendants' Joint Motion to Dismiss Pursuant to Rule 12(b)(6) Plaintiffs' Non-Priority Claims (ECF No. 597);

(2) Personal Injury and School District/Local Government Entity Plaintiffs' Opposition to Defendants' Motions to Dismiss the Personal Injury Plaintiffs' Consumer Protection Claims (Count 7) and Meta's Motion to Dismiss the Personal Injury Plaintiffs' Misrepresentation Claims (Counts 8-9) (ECF No. 600);

(3) Personal Injury and School District/Local Government Entity Plaintiffs' Opposition to Defendants' Motion to Dismiss the School District and Local Government Entities' Master Complaint (ECF No. 668); and

(4) State Attorneys General Plaintiffs' Opposition to Defendants' Motion to Dismiss the Multistate Attorneys General Complaint and Florida Attorney General Complaint (ECF No. 599).

Plaintiffs submit this authority via Administrative Motion rather than a Statement of Recent Decision because Civil Local Rule 7-3(d) provides that Statements of Recent Decision must be submitted "before the noticed hearing date." Civil L.R. 7-3(d)(2). The decision subject to this Administrative Motion was issued after the completion of briefing and argument on the motions listed above.

DATED: September 4, 2024

Respectfully submitted,

By: /s/ Lexi J. Hazam

LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
 BERNSTEIN, LLP**  
 275 BATTERY STREET, 29TH FLOOR  
 SAN FRANCISCO, CA 94111-3339  
 Telephone: 415-956-1000  
 lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
 401 9th Street NW Suite 630  
 Washington DC 20004  
 Telephone: 202-386-9610  
 pwarren@motleyrice.com

Co-Lead Counsel

1  
2 CHRISTOPHER A. SEEGER  
3 **SEEGER WEISS, LLP**  
4 55 CHALLENGER ROAD, 6TH FLOOR  
5 RIDGEFIELD PARK, NJ 07660  
6 Telephone: 973-639-9100  
7 cseeger@seegerweiss.com

8 Counsel to Co-Lead Counsel

9 JENNIE LEE ANDERSON  
10 **ANDRUS ANDERSON, LLP**  
11 155 MONTGOMERY STREET, SUITE 900  
12 SAN FRANCISCO, CA 94104  
13 Telephone: 415-986-1400  
14 jennie@andrusanderson.com

15 Liaison Counsel

16 MICHAEL M. WEINKOWITZ  
17 **LEVIN SEDRAN & BERMAN, LLP**  
18 510 WALNUT STREET  
19 SUITE 500  
20 PHILADELPHIA, PA 19106  
21 Telephone: 215-592-1500  
22 mweinkowitz@lfsbalw.com

23 MELISSA YEATES  
24 **KESSLER TOPAZ MELTZER & CHECK**  
25 **LLP**  
26 280 KING OF PRUSSIA ROAD  
27 RADNOR, PA 19087  
28 Telephone: 610-667-7706  
myeates@ktmc.com

Co-Chairs of Local Government Entity  
Subcommittee

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
633 WEST FIFTH STREET, SUITE 2652  
LOS ANGELES, CA 90071  
Telephone: 213-787-8590  
ejeffcott@forthepeople.com

1 JOSEPH VANZANDT  
2 **BEASLEY ALLEN**  
3 234 COMMERCE STREET  
4 MONTGOMERY, LA 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

5 Federal/State Liaisons

6 MATTHEW BERGMAN  
7 GLENN DRAPER  
8 **SOCIAL MEDIA VICTIMS LAW CENTER**  
9 821 SECOND AVENUE, SUITE 2100  
SEATTLE, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org  
10 glenn@socialmediavictims.org

11 JAMES J. BILSBORROW  
12 **WEITZ & LUXENBERG, PC**  
13 700 BROADWAY  
NEW YORK, NY 10003  
Telephone: 212-558-5500  
14 jbilborrow@weitzlux.com

15 JAYNE CONROY  
16 **SIMMONS HANLY CONROY, LLC**  
17 112 MADISON AVE, 7TH FLOOR  
NEW YORK, NY 10016  
Telephone: 917-882-5522  
18 jconroy@simmonsfirm.com

19 ANDRE MURA  
20 **GIBBS LAW GROUP, LLP**  
21 1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: 510-350-9717  
22 amm@classlawgroup.com

23 ALEXANDRA WALSH  
24 **WALSH LAW**  
25 1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
26 awalsh@alexwalshlaw.com

27 Plaintiffs' Steering Committee Leadership  
28

1                   RON AUSTIN  
2                   **RON AUSTIN LAW**  
3                   400 MANHATTAN BLVD.  
4                   HARVEY, LA 70058  
                  Telephone: 504-227-8100  
                  raustin@ronaustinlaw.com

5                   PAIGE BOLDT  
6                   **WALSH LAW**  
7                   4 Dominion Drive, Bldg. 3, Suite 100  
8                   San Antonio, TX 78257  
                  Telephone: 210-448-0500  
                  PBoldt@alexwalshlaw.com

9                   THOMAS P. CARTMELL  
10                  **WAGSTAFF & CARTMELL LLP**  
11                  4740 Grand Avenue, Suite 300  
12                  Kansas City, MO 64112  
                  Telephone: 816-701-1100  
                  tcartmell@wcllp.com

13                  SARAH EMERY  
14                  **HENDY JOHNSON VAUGHN EMERY PSC**  
15                  600 WEST MAIN STREET, SUITE 100  
16                  LOUISVILLE, KY 40202  
                  Telephone: 859-600-6725  
                  semery@justicestartshere.com

17                  CARRIE GOLDBERG  
18                  **C.A. GOLDBERG, PLLC**  
19                  16 Court St.  
20                  Brooklyn, NY 11241  
                  Telephone: 646-666-8908  
                  carrie@cagoldberglaw.com

21                  RONALD E. JOHNSON, JR.  
22                  **HENDY JOHNSON VAUGHN EMERY PSC**  
23                  600 WEST MAIN STREET, SUITE 100  
24                  LOUISVILLE, KY 40202  
                  Telephone: 859-578-4444  
                  rjohnson@justicestartshere.com

25                  SIN-TING MARY LIU  
26                  **AYLSTOCK WITKIN KREIS &**  
27                  **OVERHOLTZ, PLLC**  
28                  17 EAST MAIN STREET, SUITE 200  
                  PENSACOLA, FL 32502  
                  Telephone: 510-698-9566

1 mliu@awkolaw.com

2 JAMES MARSH  
3 **MARSH LAW FIRM PLLC**  
4 31 HUDSON YARDS, 11TH FLOOR  
5 NEW YORK, NY 10001-2170  
6 Telephone: 212-372-3030  
7 jamesmarsh@marshlaw.com

8 JOSEPH E. MELTER  
9 **KESSLER TOPAZ MELTZER & CHECK**  
10 **LLP**  
11 280 KING OF PRUSSIA ROAD  
12 RADNOR, PA 19087  
13 Telephone: 610-667-7706  
14 jmeltzer@ktmc.com

15 HILLARY NAPPI  
16 **HACH & ROSE LLP**  
17 112 Madison Avenue, 10th Floor  
18 New York, New York 10016  
19 Telephone: 212-213-8311  
20 hnappi@hrsclaw.com

21 EMMIE PAULOS  
22 **LEVIN PAPANTONIO RAFFERTY**  
23 316 SOUTH BAYLEN STREET, SUITE 600  
24 PENSACOLA, FL 32502  
25 Telephone: 850-435-7107  
26 epaulos@levinlaw.com

27 RUTH THI RIZKALLA  
28 **THE CARLSON LAW FIRM, PC**  
1500 ROSECRANS AVE., STE. 500  
MANHATTAN BEACH, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

ROLAND TELLIS  
DAVID FERNANDES  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: 818-839-2333  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

DIANDRA “FU” DEBROSSE  
ZIMMERMANN  
**DICELLO LEVITT**  
505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205-855-5700  
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

**PHILIP J. WEISER**

Attorney General  
State of Colorado

/s/ Bianca E. Miyata

Bianca E. Miyata, CO Reg. No. 42012,  
*pro hac vice*  
Senior Assistant Attorney General  
Lauren M. Dickey, CO Reg. No. 45773,  
*pro hac vice*  
First Assistant Attorney General  
Megan Paris Rundlet, CO Reg. No. 27474  
Senior Assistant Solicitor General  
Elizabeth Orem, CO Reg. No. 58309  
Assistant Attorney General  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
Consumer Protection Section  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Phone: (720) 508-6651  
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.  
Philip J. Weiser, Attorney General*

**ROB BONTA**

Attorney General  
State of California

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)  
Senior Assistant Attorney General  
Bernard Eskandari (SBN 244395)  
Emily Kalanithi (SBN 256972)  
Supervising Deputy Attorneys General  
Nayha Arora (CA SBN 350467)  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer (CA SBN 336428)  
Marissa Roy (CA SBN 318773)  
Brendan Ruddy (CA SBN 297896)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480



Megan.Oneill@doj.ca.gov

*Attorneys for Plaintiff the People of the State of California*

**RUSSELL COLEMAN**  
Attorney General  
Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109),

*Pro hac vice*

Philip Heleringer (KY Bar No. 96748),

*Pro hac vice*

Zachary Richards (KY Bar No. 99209),

*Pro hac vice*

Daniel I. Keiser (KY Bar No. 100264),

*Pro hac vice*

Matthew Cocanougher (KY Bar No. 94292),

*Pro hac vice*

Assistant Attorneys General

1024 Capital Center Drive, Suite 200

Frankfort, KY 40601

CHRISTIAN.LEWIS@KY.GOV

PHILIP.HELERINGER@KY.GOV

ZACH.RICHARDS@KY.GOV

DANIEL.KEISER@KY.GOV

MATTHEW.COCANOUGH@KY.GOV

Phone: (502) 696-5300

Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of Kentucky*

**MATTHEW J. PLATKIN**  
Attorney General  
State of New Jersey

/s/ Kashif T. Chand

Kashif T. Chand (NJ Bar No. 016752008),

*Pro hac vice*

Section Chief, Deputy Attorney General

Thomas Huynh (NJ Bar No. 200942017),

*Pro hac vice*

Assistant Section Chief, Deputy Attorney  
General

Verna J. Pradaxay (NJ Bar No. 335822021),

*Pro hac vice*

1 Mandy K. Wang (NJ Bar No. 373452021),  
2 *Pro hac vice*  
3 Deputy Attorneys General  
4 New Jersey Office of the Attorney General,  
5 Division of Law  
6 124 Halsey Street, 5th Floor  
7 Newark, NJ 07101  
8 Tel: (973) 648-2052  
9 Kashif.Chand@law.njoag.gov  
10 Thomas.Huynh@law.njoag.gov  
11 Verna.Pradaxay@law.njoag.gov  
12 Mandy.Wang@law.njoag.gov

13 *Attorneys for Plaintiff New Jersey*  
14 *Division of Consumer Affairs*  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION**

I, Lexi J. Hazam, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 4, 2024

By: /s/ Lexi J. Hazam